



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 19, 2019

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**APPLICATION GRANTED  
SO ORDERED** *Vern Bro*  
**VERNON S. BRODERICK**  
**U.S.D.J.** 12/19/2019

The status conference is adjourned to February 7, 2020 at 2:30 p.m.

Re: *United States v. Constantine Giannakos*  
09 Cr. 940 (VSB)

Dear Judge Broderick:

The Government writes to respectfully request that the sentencing currently scheduled in the above-captioned matter for this Friday, December 20, 2019 at 2:30 p.m., be adjourned for at least 45 days. At the initial sentencing conference held before Your Honor on November 21, 2019 (the "November 21st conference"), Your Honor requested, among other things, that the parties make efforts to learn how the defendant's potential incarceration would affect his employment status with his current employer. It is the Government's understanding that since the November 21st conference, defense counsel have learned some information from the defendant's employer relating to Your Honor's inquiry. However, despite their best efforts, defense counsel have been unable to arrange for a joint phone call or meeting between the defendant's employer, the Government, and defense counsel, so that the Government may question the defendant's employer regarding that information. As such, the Government respectfully requests that the defendant's sentencing be adjourned at least 45 days to give the parties more time to arrange a joint phone call or meeting with the defendant's employer, defense counsel, and the Government. Defense counsel consent to this request.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

*Robert L. Boone*

By: \_\_\_\_\_

cc: Defense Counsel (by email)

Robert L. Boone  
Assistant United States Attorney